

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

QUEEN HIGGS,	)	
	)	<b>No. 07 C 6989</b>
Plaintiff,	)	
	)	
v.	)	JUDGE GUZMAN
	)	
CITY OF CHICAGO, ILLINOIS and CHICAGO,	)	
POLICE OFFICER I. CHAVEZ, Star No.	)	Magistrate Judge Cox
3278, and CHICAGO POLICE OFFICER	)	
A.R. SCHURMAN, Star No. 13751,	)	
	)	JURY DEMAND
Defendants.	)	

**CITY OF CHICAGO'S AGREED MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Defendant City of Chicago ("City"), by its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully moves for an extension of time to March 4, 2008 to answer or otherwise plead in response to Plaintiff's complaint. In support of this motion, the City states the following:

1. Plaintiff filed his complaint on or about December 12, 2007. The City Clerk's Office was served with Plaintiff's complaint on or about January 2, 2008.
2. Undersigned counsel for the City was assigned the case on or about January 28, 2008, the first opportunity that undersigned counsel had to review Plaintiff's complaint.
3. The Office of the Corporation Counsel and the Chicago Police Department are still in the process of investigating the allegations in Plaintiff's complaint and compiling the pertinent records.
4. This motion is the City's first request for an extension of time to answer or otherwise plead. This request is made not to delay the proceedings but rather to allow the City to

respond properly to the allegations in Plaintiff's complaint.

5. Undersigned counsel spoke with one of Plaintiff's attorneys, Katie Z. Ehrmin of the Law Offices of Jeffrey B. Granich, by telephone on January 29, 2008. Ms. Ehrmin said that she has no objection to the City's request for an extension of time to answer or otherwise plead.

WHEREFORE, Defendant City of Chicago respectfully requests that it be given an extension of time to March 4, 2008 to answer or otherwise plead in response to Plaintiff's complaint; and for any other relief that this Honorable Court deems proper.

Respectfully submitted,

MARA S. GEORGES  
Corporation Counsel  
City of Chicago

BY: /s/ Thomas J. Aumann  
THOMAS J. AUMANN  
Assistant Corporation Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that I have caused true and correct copies of the above and foregoing **Notice of Motion and City of Chicago's Agreed Motion for Extension of Time to Answer or Otherwise Plead to Plaintiff's Complaint** to be served upon Jeffrey B. Granich at jeffrey granich@mac.com, via electronic mail, on this 29th day of January, 2008.

/s/ Thomas J. Aumann  
THOMAS J. AUMANN  
Assistant Corporation Counsel